

EXHIBIT A

NOTC

ROGER L. GRANDGENETT II, ESQ., Bar # 6323

AMY THOMPSON, ESQ., Bar # 11907

KELSEY E. STEGALL, ESQ., Bar # 14279

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Attorney for Defendant, Benjamin Wood

DISTRICT COURT

CLARK COUNTY, NEVADA

NICOLE GREENE, an individual;

Plaintiff,

vs.

BENJAMIN WOOD, an individual; and
FRONTIER AIRLINES, INC., a Foreign
Corporation; DOES 1 through 20,
inclusive; ROE CORPORATIONS, 1
through 20, inclusive;

Defendants.

Case No. A-20-809599-C

Dept. 18

**NOTICE TO STATE COURT OF FILING OF
NOTICE OF REMOVAL OF CIVIL ACTION
TO FEDERAL COURT**

TO THE EIGHTH JUDICIAL DISTRICT COURT:

PLEASE TAKE NOTICE that Defendants FRONTIER AIRLINES, INC., and BENJAMIN WOOD (collectively "Defendant") filed a Notice of Removal of the above-referenced matter in the Office of the Clerk of the United States District Court in and for the District of Nevada. A true and

1 correct copy of the notice and accompanying exhibits is attached and incorporated as **Exhibit A**.

2 PLEASE TAKE FURTHER NOTICE that the filing of the Notice of Removal, together with
3 a copy of the notice with the Clerk of this Court, effectuates the removal of this action in accordance
4 with 28 U.S.C. §§ 1332, 1441(b), and 1446.

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6 Dated: May 6, 2020.

7 Respectfully submitted,

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9
10 ROGER L. GRANDGENETT II, ESQ.
11 AMY THOMPSON, ESQ.
12 KELSEY E. STEGALL, ESQ.
13 LITTLER MENDELSON, P.C.

14 Attorneys for Defendant
15 FRONTIER AIRLINES, INC.

16 /s/ Ross C. Goodman, Esq.
17 ROSS C. GOODMAN, ESQ. (7722)
18 GOODMAN LAW GROUP, P.C.
19 520 S. Fourth Street, Second Floor
20 Las Vegas, Nevada 89101

21 *Attorney for Defendant Benjamin Wood*
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PROOF OF SERVICE

I am a resident of the State of Nevada, over the age of eighteen years, and not a party to the within action. My business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada 89169. On May 6, 2020, I served the within document(s):

NOTICE TO STATE COURT OF FILING OF NOTICE OF REMOVAL OF CIVIL ACTION TO FEDERAL COURT

☒ Via **Electronic Service** - pursuant to N.E.F.C.R Administrative Order: 14-2.

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Attorney for Plaintiff
Nicole Greene

I am readily familiar with the firm's practice of collection and processing correspondence for mailing and for shipping via overnight delivery service. Under that practice it would be deposited with the U.S. Postal Service or if an overnight delivery service shipment, deposited in an overnight delivery service pick-up box or office on the same day with postage or fees thereon fully prepaid in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2020, at Las Vegas,

/s/ Maribel Rodriguez
Maribel Rodriguez

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